

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

---

In re: ) **Chapter 11**  
BlockFi, Inc., *et al.*,<sup>1</sup> ) **Case No. 22-19361 (MBK)**  
Debtors. ) **(Jointly Administered)**  
)

---

**THIRD MONTHLY FEE STATEMENT OF DELOITTE TAX LLP AS TAX SERVICES  
PROVIDER TO THE DEBTORS AND DEBTORS-IN-POSSESSION FOR  
THE PERIOD FROM MAY 1, 2023 THROUGH MAY 31, 2023**

Name of Applicant:	Deloitte Tax LLP	
Authorized to Provide Professional Services as:	Tax Services Provider	
Date of Retention:	<i>Nunc Pro Tunc</i> to March 1, 2023	
Period for which Compensation and Reimbursement is Sought:	May 1, 2023 through May 31, 2023	
Total Amount of Fees Requested:	\$	206,883.00
Less: 20% Holdback	\$	(41,376.60)
80% of Compensation Sought as Actual, Reasonable, and Necessary	\$	165,506.40
Amount of Expense Reimbursement Sought	\$	691.42
Total Amount of Fees and Expense:	\$	<b>166,197.82</b>

This is an:  Monthly  Interim  Final Application

<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

Deloitte Tax LLP (“Deloitte Tax”) hereby submits this third monthly fee statement (the “Third Monthly Statement”) for allowance of compensation for services rendered as tax services providers to the Debtors for the period from May 1, 2023, through May 31, 2023, pursuant to the *Administrative Fee Order Establishing Procedures for the Allowance and Payment of Interim Compensation and Reimbursement of Expenses of Professionals Retained by Order of this Court* [Docket No. 307] (the “Interim Compensation Order”).

WHEREFORE, Deloitte Tax respectfully requests payment in the amount of \$165,506.40 (80% of \$206,883.00) as compensation sought for actual and necessary services rendered, together with expenses of \$691.42, for a total requested payment of \$166,197.82, in accordance with the terms of the Interim Compensation Order.

Date: July 24, 2023  
New York, New York

Respectfully submitted,

DELOITTE TAX LLP

/s/ Kenneth Schulhof  
Kenneth Schulhof  
Partner  
30 Rockefeller Plaza  
New York, NY 10112  
Telephone: 212.436.5370  
Facsimile: 212.653.5254

**CUMULATIVE TIME SUMMARY BY PROFESSIONAL**

For the Period of May 1, 2023 through May 31, 2023

Professional	Level	Rate	Hours	Fees
<b><i>Firm Retention</i></b>				
Velazco, Valerie	Senior Manager	\$1,020.00	0.2	\$204.00
<b>Professional Subtotal:</b>			<b>0.2</b>	<b>\$204.00</b>

Professional	Level	Hours	Fees
<b><i>Tax Compliance Services</i></b>			
Forrest, Jonathan	Partner/Principal	1.3	
Gibian, Craig	Partner/Principal	4.6	
Schulhof, Ken	Partner/Principal	18.8	
Massey, Rob	Partner/Principal	1.5	
Krozek, Derek	Managing Director	0.3	
Gardyn, Jordon	Senior Manager	43.7	
Lang, Mary Jo	Senior Manager	11.1	
Lee, Sarah	Senior Manager	8.8	
DiPaolo, Michele	Manager	0.5	
Wojtas, Mike	Senior Consultant	29.3	
Kothari, Mahek	Consultant	0.1	
Meng, Zhaoyu	Consultant	31.0	
Wilson, Clinton	Consultant	12.8	
<b>Professional Subtotal:</b>		<b>163.8</b>	<b>\$154,540.00</b>

Professional	Level	Rate	Hours	Fees
<b><i>Tax Restructuring Services</i></b>				
Gibian, Craig	Partner/Principal	\$1,160.00	1.7	\$1,972.00
Richter, Jason	Partner/Principal	\$1,160.00	12.2	\$14,152.00
Gardyn, Jordon	Senior Manager	\$1,020.00	1.6	\$1,632.00
Lang, Mary Jo	Senior Manager	\$1,020.00	5.1	\$5,202.00
Velazco, Valerie	Senior Manager	\$1,020.00	13.6	\$13,872.00
Hammill, John	Senior Consultant	\$630.00	24.3	\$15,309.00
<b>Professional Subtotal:</b>			<b>58.5</b>	<b>\$52,139.00</b>
<b>Total</b>		Blended Hourly Rate: \$929.81	<b>222.5</b>	<b>\$206,883.00</b>

**CUMULATIVE FEES BY CATEGORY SUMMARY**  
For the Period of May 1, 2023 through May 31, 2023

<b>Categories</b>	<b>Hours</b>	<b>Fees</b>
Firm Retention	0.2	\$204.00
Tax Compliance Services	163.8	\$154,540.00
Tax Restructuring Services	58.5	\$52,139.00
<b>Fees Category Subtotal :</b>	<b>222.5</b>	<b>\$206,883.00</b>

**CUMULATIVE EXPENSES BY CATEGORY SUMMARY**  
For the Period of May 1, 2023 through May 31, 2023

<b>Expense Categories</b>	<b>Total Expenses for the Period</b>
Airfare	\$344.53
Internet Access While Traveling	\$19.00
Hotel	\$294.97
Meals	\$32.92
<b>Expense Category Subtotal :</b>	<b>\$691.42</b>

**EXHIBIT A**

Professional Fees for the Period from  
May 1, 2023 through May 31, 2023

## Deloitte Tax LLP

### Fees Sorted by Category for the Fee Period

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Firm Retention</i></b>				
05/08/2023				
Velazco, Valerie	E-mail communications with J. Richter, M. Rothchild, and J. Gardyn (Deloitte) to follow-up on Deloitte conflicts check to confirm the IRC section 382 (net operating loss carryforward rules) work has been approved.	\$1,020.00	0.2	\$204.00
Subtotal for Firm Retention:			0.2	\$204.00
<b><i>Tax Compliance Services</i></b>				
05/01/2023				
Forrest, Jonathan	Discussion with J. Gardyn, C. Gibian, D. Krozek, R. Massey, K. Schulhof, E. Tzavelis (Deloitte Tax) regarding next steps related to tax analysis in connection with BlockFi case and related considerations.	\$0.00	0.5	\$0.00
Gardyn, Jordon	Call with C. Gibian, MJ. Lang, K. Schulhof (Deloitte) to review 2022 BlockFi financials and identifying questions and items to request additional details on.	\$0.00	0.5	\$0.00
Gardyn, Jordon	Discussion with J. Forrest, C. Gibian, D. Krozek, R. Massey, K. Schulhof, E. Tzavelis (Deloitte Tax) regarding next steps related to tax analysis in connection with BlockFi case and related considerations.	\$0.00	0.5	\$0.00
Gardyn, Jordon	Review the 2022 supporting schedules provided on the details behind the balance sheet account line items to identify questions.	\$0.00	1.6	\$0.00
Gibian, Craig	Discussion with J. Forrest, J. Gardyn, D. Krozek, R. Massey, K. Schulhof, E. Tzavelis (Deloitte Tax) regarding next steps related to tax analysis in connection with BlockFi case and related considerations.	\$0.00	0.5	\$0.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Compliance Services</i></b>				
05/01/2023				
Gibian, Craig	Call with J. Gardyn, MJ. Lang, K. Schulhof (Deloitte) to review 2022 BlockFi financials and identifying questions and items to request additional details on.	\$0.00	0.5	\$0.00
Lang, Mary Jo	Review 2022 BlockFi Inc. financials for purposes of BlockFi Inc. 2022 taxable income computation.	\$0.00	0.6	\$0.00
Lang, Mary Jo	Call with J. Gardyn, C. Gibian, K. Schulhof (Deloitte) to review 2022 BlockFi financials and identifying questions and items to request additional details on.	\$0.00	0.5	\$0.00
Massey, Rob	Discussion with J. Forrest, J. Gardyn, C. Gibian, D. Krozek, K. Schulhof, E. Tzavelis (Deloitte Tax) regarding next steps related to tax analysis in connection with BlockFi case and related considerations.	\$0.00	0.5	\$0.00
Schulhof, Ken	Call with J. Gardyn, C. Gibian, MJ. Lang (Deloitte) to review 2022 BlockFi financials and identifying questions and items to request additional details on.	\$0.00	0.5	\$0.00
Schulhof, Ken	Call with C. Gibian, MJ. Lang, M. Wojtas, J. Gardyn (Deloitte) discussing follow up questions on BlockFi 2022 balance sheet and income statement provided and plan to calculate taxable income for the year 2022.	\$0.00	0.5	\$0.00
Schulhof, Ken	Discussion with J. Forrest, J. Gardyn, C. Gibian, D. Krozek, R. Massey, E. Tzavelis (Deloitte Tax) regarding next steps related to tax analysis in connection with BlockFi case and related considerations.	\$0.00	0.5	\$0.00
Schulhof, Ken	Review list of questions from J. Gardyn (Deloitte) going through support provided that were summarized in the BlockFi 2022 tax return workpapers.	\$0.00	1.0	\$0.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Compliance Services</i></b>				
05/01/2023				
Schulhof, Ken	Call with C. Gibian, MJ. Lang, J. Gardyn (Deloitte) regarding questions on the 2022 balance sheet account classifications in advance of call with A. Sexton (Kirkland and Ellis), R. Loban (BlockFi).	\$0.00	0.8	\$0.00
05/02/2023				
Gardyn, Jordon	Discussion with K. Schulhof (Deloitte) (partial) regarding engagement team members and identify potential staff to onboard onto the engagement team.	\$0.00	0.7	\$0.00
Gardyn, Jordon	Summarize the responses provided by S. Bailey (BlockFi) regarding questions on BlockFi 2022 financials.	\$0.00	0.8	\$0.00
Gardyn, Jordon	Compare the generally accepted accounting principals financial statements to the management fair value financial statements for the differences in the mark-to-market calculation prepared for purposes of the BlockFi 2021 amended tax returns.	\$0.00	1.3	\$0.00
Kothari, Mahek	Setup archive folder for BlockFi.	\$0.00	0.1	\$0.00
Meng, Zhaoyu	Prepare a reconciliation between the consolidated trial balance and the financial statement to aid in the preparation of BlockFi 2022 tax return workpapers.	\$0.00	3.5	\$0.00
Schulhof, Ken	Consider the potential taxable income impacts for the BlockFi responses to the questions asked regarding the changes in the accounts on the 2022 balance sheet vs the 2021 balance sheet presentation.	\$0.00	0.4	\$0.00
Schulhof, Ken	Discussion with J. Gardyn (Deloitte) regarding engagement team members and identify potential staff to onboard onto the engagement team.	\$0.00	0.6	\$0.00
Schulhof, Ken	Evaluate the changes required to the amended return to provide direction on how to calculate the M-1s from book to taxable income.	\$0.00	0.8	\$0.00

## Deloitte Tax LLP

### Fees Sorted by Category for the Fee Period

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Compliance Services</i></b>				
05/03/2023				
	Gardyn, Jordon Share the BlockFi 2021 tax return supporting schedules with M. Wojtas and S. Lee (Deloitte) to further identify areas to focus on for changes for amended filing.	\$0.00	0.8	\$0.00
	Wojtas, Mike Review 2022 trial balances provided by client to financials.	\$0.00	1.2	\$0.00
	Wojtas, Mike Review coding of trial balances to Corptax accounts for import and set-up of 2022 tax return.	\$0.00	0.8	\$0.00
05/04/2023				
	Gardyn, Jordon Summarize responses to questions provided by S. Bailey (BlockFi) and incorporate them as notes into the Deloitte Tax prepared 2022 summary tax return workbook.	\$0.00	1.7	\$0.00
	Gardyn, Jordon Discuss with K. Schulhof (Deloitte) BlockFi responses on 2022 income statement and balance sheet to understand whether additional changes are required to the 2021 filed tax returns based on updated understanding of the 2022 income statement.	\$0.00	0.5	\$0.00
	Lee, Sarah Review 2021 tax return for potential further adjustments required on amended returns for updating fair value amounts.	\$0.00	3.0	\$0.00
	Schulhof, Ken Review updated 2022 tax return workpapers with S. Bailey (BlockFi) responses incorporated to provide comments to J. Gardyn (Deloitte) on further updates to be made to the 2022 tax return workpapers.	\$0.00	0.8	\$0.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Compliance Services</i></b>				
05/04/2023				
Schulhof, Ken	Discuss with J. Gardyn (Deloitte) BlockFi responses on 2022 income statement and balance sheet to understand whether additional changes are required to the 2021 filed tax returns based on updated understanding of the 2022 income statement.	\$0.00	0.5	\$0.00
Wojtas, Mike	Review 2022 trial balance accounts for mapping of line items into the 2022 BlockFi Inc and Subs income statement and balance sheet.	\$0.00	1.1	\$0.00
Wojtas, Mike	Review coding of trial balances to Corptax accounts for import and set-up of 2022 tax return.	\$0.00	0.9	\$0.00
05/05/2023				
Gardyn, Jordon	Email A. Sexton (Kirkland and Ellis), R. Loban (BlockFi) regarding information request list for expected engagement timeline for BlockFi 2022 tax return preparation and IRC section 382 (net operating loss carryforward limitation rules) study analysis.	\$0.00	0.8	\$0.00
Gardyn, Jordon	Update the 2022 Deloitte Tax workpaper to share with C. Gibian, MJ. Lang, and K. Schulhof (Deloitte) regarding responses received from S. Bailey (BlockFi) and support received for the custodian asset balance support received.	\$0.00	2.1	\$0.00
Gardyn, Jordon	Discussion with K. Schulhof, D. Krozek (Deloitte Tax) regarding BlockFi case status update and related tax considerations.	\$0.00	0.3	\$0.00
Gardyn, Jordon	Call with M. Wojtas (Deloitte) reconciling differences from the separate legal entity trial balances consolidation prepared by Deloitte compared to BlockFi's consolidated financials.	\$0.00	0.8	\$0.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Compliance Services</i></b>				
05/05/2023				
Gardyn, Jordon	Call with S. Lee, K. Schulhof, M. Wojtas (Deloitte) to catch up on status and explain to team the adjustments from originally filed BlockFi 2021 tax return for reasons to amend the 2021 filings.	\$0.00	0.5	\$0.00
Krozek, Derek	Discussion with J. Forrest, J. Gardyn, C. Gibian, R. Massey, K. Schulhof, E. Tzavelis (Deloitte Tax) regarding next steps related to tax analysis in connection with BlockFi case and related considerations.	\$0.00	0.3	\$0.00
Lee, Sarah	Call with J. Gardyn, K. Schulhof, M. Wojtas (Deloitte) to catch up on status and explain to team the adjustments from originally filed BlockFi 2021 tax return for reasons to amend the 2021 filings.	\$0.00	0.5	\$0.00
Lee, Sarah	Reconcile BlockFi separate entity trial balances with updated financials to aid in the preparation of 2022 tax return workpapers.	\$0.00	3.8	\$0.00
Schulhof, Ken	Discussion with J. Gardyn, D. Krozek (Deloitte Tax) regarding BlockFi case status update and related tax considerations.	\$0.00	0.3	\$0.00
Schulhof, Ken	Review the summary financial statements included in the BlockFi 2022 tax return workpapers with tie-out to support and BlockFi responses incorporated within the 2022 tax return workpapers.	\$0.00	0.8	\$0.00
Schulhof, Ken	Call with J. Gardyn, S. Lee, M. Wojtas (Deloitte) to catch up on status and explain to team the adjustments from originally filed BlockFi 2021 tax return for reasons to amend the 2021 filings.	\$0.00	0.5	\$0.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Compliance Services</i></b>				
05/05/2023				
Wojtas, Mike	Call with J. Gardyn, S. Lee, K. Schulhof (Deloitte) to catch up on status and explain to team the adjustments from originally filed BlockFi 2021 tax return for reasons to amend the 2021 filings.	\$0.00	0.5	\$0.00
Wojtas, Mike	Call with J. Gardyn (Deloitte) reconciling differences from the separate legal entity trial balances consolidation prepared by Deloitte compared to BlockFi's consolidated financials.	\$0.00	0.8	\$0.00
05/08/2023				
Gardyn, Jordon	Call with C. Gibian, R. Massey, K. Schulhof (Deloitte) discussing calculating 2022 taxable income and considerations for the dollarized debtor claims and whether it should be mark-to-market for tax purposes.	\$0.00	0.5	\$0.00
Gibian, Craig	Call with J. Gardyn, R. Massey, K. Schulhof (Deloitte) discussing calculating 2022 taxable income and considerations for the dollarized debtor claims and whether it should be mark-to-market for tax purposes.	\$0.00	0.5	\$0.00
Lang, Mary Jo	Review updated 2022 BlockFi Inc. financial information to prepare comments and questions.	\$0.00	0.8	\$0.00
Massey, Rob	Call with J. Gardyn, C. Gibian, K. Schulhof (Deloitte) discussing calculating 2022 taxable income and considerations for the dollarized debtor claims and whether it should be mark-to-market for tax purposes.	\$0.00	0.5	\$0.00
Schulhof, Ken	Call with J. Gardyn, C. Gibian, R. Massey (Deloitte) discussing calculating 2022 taxable income and considerations for the dollarized debtor claims and whether it should be mark-to-market for tax purposes.	\$0.00	0.5	\$0.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Compliance Services</i></b>				
05/09/2023				
Gardyn, Jordon	Call with C. Gibian, MJ. Lang, K. Schulhof, M. Wojtas (Deloitte) discussing follow up questions on 2022 income statement and balance sheet provided by BlockFi and calculating taxable income on a mark-to-market approach for 2022 tax returns.	\$0.00	0.5	\$0.00
Gardyn, Jordon	Send email to R. Loban (BlockFi) with questions on the breakout of the 2022 balance sheet accounts included in the financial statements prepared by BlockFi.	\$0.00	0.7	\$0.00
Gardyn, Jordon	Review the investment roll-forward prepared by S. Bailey (BlockFi) and sent questions back to S. Bailey (BlockFi) on reconciling amounts to the 2022 financial statements.	\$0.00	1.6	\$0.00
Gibian, Craig	Call with J. Gardyn, MJ. Lang, K. Schulhof, M. Wojtas (Deloitte) discussing follow up questions on 2022 income statement and balance sheet provided by BlockFi and calculating taxable income on a mark-to-market approach for 2022 tax returns.	\$0.00	0.5	\$0.00
Lang, Mary Jo	Review updated BlockFi Inc. 2022 financials.	\$0.00	0.5	\$0.00
Lang, Mary Jo	Call with J. Gardyn, C. Gibian, K. Schulhof, M. Wojtas (Deloitte) discussing follow up questions on 2022 income statement and balance sheet provided by BlockFi and calculating taxable income on a mark-to-market approach for 2022 tax returns.	\$0.00	0.5	\$0.00
Schulhof, Ken	Call with J. Gardyn, C. Gibian, MJ. Lang, M. Wojtas (Deloitte) discussing follow up questions on 2022 income statement and balance sheet provided by BlockFi and calculating taxable income on a mark-to-market approach for 2022 tax returns.	\$0.00	0.5	\$0.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Compliance Services</i></b>				
05/09/2023				
	Schulhof, Ken Review the investment roll-forward support provided by S. Bailey (BlockFi) to share questions with J. Gardyn (Deloitte) to further send to S. Bailey and R. Loban (both BlockFi) regarding the accounting method utilized for the investment rollforward.	\$0.00	0.8	\$0.00
	Wojtas, Mike Prepare workpaper for 2022 tax return.	\$0.00	0.9	\$0.00
	Wojtas, Mike Call with J. Gardyn, C. Gibian, MJ. Lang, K. Schulhof (Deloitte) discussing follow up questions on 2022 income statement and balance sheet provided by BlockFi and calculating taxable income on a mark-to-market approach for 2022 tax returns.	\$0.00	0.5	\$0.00
	Wojtas, Mike Compile request items received from client for 2022 tax return.	\$0.00	0.6	\$0.00
05/10/2023				
	Gardyn, Jordon Summarize responses from S. Bailey (BlockFi) on questions sent via email on the 2022 financial statements.	\$0.00	0.8	\$0.00
	Lang, Mary Jo Review BlockFi Inc. 2022 financials in preparing tax analysis.	\$0.00	0.8	\$0.00
	Meng, Zhaoyu Reconcile separate entity trial balances with BlockFi financials to eliminate intercompany accounts.	\$0.00	3.5	\$0.00
	Meng, Zhaoyu Update trial balance account coding and descriptions for tax software data importing.	\$0.00	2.5	\$0.00
	Meng, Zhaoyu Meeting with M. Wojtas (Deloitte) for tax return 2022 workpaper regarding reconciliation of separate entity trial balances to BlockFi financials and tax software coding.	\$0.00	1.2	\$0.00
	Meng, Zhaoyu Meeting with M. Wojtas (Deloitte) regarding BlockFi tax return 2022 workpaper.	\$0.00	0.5	\$0.00
	Wojtas, Mike Meeting with Z. Meng (Deloitte) regarding BlockFi tax return 2022 workpaper.	\$0.00	0.5	\$0.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Compliance Services</i></b>				
05/10/2023				
	Wojtas, Mike Meeting with Z. Meng (Deloitte) for tax return 2022 workpaper regarding reconciliation of separate entity trial balances to BlockFi financials and tax software coding.	\$0.00	1.2	\$0.00
05/11/2023				
	Gardyn, Jordon Discussion with K. Schulhof (Deloitte) regarding open requests and questions currently with R. Loban and S. Bailey (BlockFi) on the BlockFi 2022 tax returns.	\$0.00	0.5	\$0.00
	Meng, Zhaoyu Reconcile separate entity trial balances with updated financials to aid in the preparation of 2022 tax return workpapers.	\$0.00	2.5	\$0.00
	Meng, Zhaoyu Meeting with M. Wojtas (Deloitte) regarding tax return 2022 workpaper, reconciling BlockFi separate entity trial balances to financials and tax software coding with updated financials.	\$0.00	0.5	\$0.00
	Schulhof, Ken Discussion with J. Gardyn (Deloitte) regarding open requests and questions currently with R. Loban and S. Bailey (BlockFi) on the BlockFi 2022 tax returns.	\$0.00	0.5	\$0.00
	Wojtas, Mike Meeting with Z. Meng (Deloitte) regarding tax return 2022 workpaper, reconciling BlockFi separate entity trial balances to financials and tax software coding with updated financials.	\$0.00	0.5	\$0.00
05/12/2023				
	Gardyn, Jordon Review support received from S. Bailey and B. Matthews (BlockFi) related to the legal agreements associated with the FTX company line of credit provided to BlockFi.	\$0.00	0.8	\$0.00
	Gardyn, Jordon Email S. Bailey (BlockFi) regarding 2022 Bitwise investor form K-1 received and request the 2021 investor form K-1 for reporting on the amended BlockFi2021 returns.	\$0.00	0.4	\$0.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Compliance Services</i></b>				
05/12/2023				
	Lang, Mary Jo Review BlockFi Inc. 2022 financials.	\$0.00	1.1	\$0.00
	Lang, Mary Jo Prepare summary outline of BlockFi Inc. 2022 tax year and taxable loss.	\$0.00	1.0	\$0.00
	Meng, Zhaoyu Prepare the consolidated balance sheet of 2022 BlockFi tax return workpapers.	\$0.00	2.5	\$0.00
	Meng, Zhaoyu Prepare the proforma book to tax reconciliation of 2022 BlockFi tax return workpapers.	\$0.00	3.0	\$0.00
	Schulhof, Ken Discussion with D. Krozek (Deloitte Tax), A. Sexton (Kirkland and Ellis) and R. Loban (BlockFi) regarding BlockFi case status update and related tax considerations.	\$0.00	0.5	\$0.00
	Schulhof, Ken Review 2022 BlockFi investor form K-1 received for Bitwise to inquire from the company as to the status of the 2021 investor form K-1 for their investment in Bitwise.	\$0.00	0.3	\$0.00
	Wojtas, Mike Review 2022 tax return workpaper, for book items, after updates made to trial balance information.	\$0.00	3.0	\$0.00
05/15/2023				
	DiPaolo, Michele Call with J. Gardyn (Deloitte) regarding status of BlockFi 2022 tax compliance and areas where we need to continue to focus on to move projects forward.	\$0.00	0.5	\$0.00
	Gardyn, Jordon Call with M. DiPaolo (Deloitte) regarding status of BlockFi 2022 tax compliance and areas where we need to continue to focus on to move projects forward.	\$0.00	0.5	\$0.00
	Gardyn, Jordon Reconcile investment roll forward support to the financial statement line items to send open questions to S. Bailey (BlockFi) on information shared.	\$0.00	2.1	\$0.00
	Gardyn, Jordon Update tax workpaper comparison for new financial support received.	\$0.00	1.4	\$0.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees	
<b><i>Tax Compliance Services</i></b>					
05/15/2023					
	Lang, Mary Jo	Review BlockFi Inc. 2022 financials and summary of BlockFi Inc. 2022 taxable income.	\$0.00	0.4	\$0.00
	Lee, Sarah	Summarize financial information in workpaper for 2022 tax return to calculate the book-to-tax adjustment for fair value reporting.	\$0.00	1.5	\$0.00
	Schulhof, Ken	Review investment roll-forward shared by S. Bailey (BlockFi) to further send questions/comments to J. Gardyn (Deloitte) on the investment schedule.	\$0.00	0.6	\$0.00
	Wilson, Clinton	Prepare federal return workpaper for US return of partnership income and New Jersey state return of partnership income.	\$0.00	0.6	\$0.00
05/16/2023					
	Gardyn, Jordon	Call with C. Gibian, MJ. Lang, K. Schulhof (Deloitte) discussing outstanding questions on the BlockFi 2022 tax return support.	\$0.00	0.8	\$0.00
	Gardyn, Jordon	Discuss with C. Gibian, MJ. Lang, K. Schulhof (Deloitte), S. Cantor, A. Sexton, K. Karnosh (Kirkland and Ellis), R. Loban (BlockFi) 2022 taxable income estimates and potential changes for tax reporting from financial statements.	\$0.00	0.5	\$0.00
	Gibian, Craig	Call with J. Gardyn, MJ. Lang, K. Schulhof (Deloitte) discussing outstanding questions on the BlockFi 2022 tax return support.	\$0.00	0.8	\$0.00
	Gibian, Craig	Call with J. Gardyn, MJ. Lang, K. Schulhof (Deloitte), S. Cantor, A. Sexton, K. Karnosh (Kirkland and Ellis), R. Loban (BlockFi) 2022 taxable income estimates and potential changes for tax reporting from financial statements.	\$0.00	0.5	\$0.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Compliance Services</i></b>				
05/16/2023				
Lang, Mary Jo	Call with J. Gardyn, C. Gibian, K. Schulhof (Deloitte), S. Cantor, A. Sexton, K. Karnosh (Kirkland and Ellis), R. Loban (BlockFi) 2022 taxable income estimates and potential changes for tax reporting from financial statements.	\$0.00	0.5	\$0.00
Lang, Mary Jo	Call with J. Gardyn, C. Gibian, K. Schulhof (Deloitte) discussing outstanding questions on the BlockFi 2022 tax return support.	\$0.00	0.8	\$0.00
Lang, Mary Jo	Review BlockFi Inc. 2022 financial information to update summary of BlockFi Inc. 2022 taxable income.	\$0.00	1.4	\$0.00
Meng, Zhaoyu	Add supporting workpapers for tax software coding and eliminations for the preparation of 2022 federal tax return workpapers.	\$0.00	1.5	\$0.00
Meng, Zhaoyu	Prepare schedule M-3 net income or loss reconciliation workpaper for 2022 BlockFi tax return.	\$0.00	1.5	\$0.00
Schulhof, Ken	Call with J. Gardyn, C. Gibian, MJ. Lang (Deloitte) discussing outstanding questions on the BlockFi 2022 tax return support.	\$0.00	0.8	\$0.00
Schulhof, Ken	Call with J. Gardyn, C. Gibian, MJ. Lang, (Deloitte), S. Cantor, A. Sexton, K. Karnosh (Kirkland and Ellis), R. Loban (BlockFi) 2022 taxable income estimates and potential changes for tax reporting from financial statements.	\$0.00	0.5	\$0.00
Wilson, Clinton	Email M. Wojtas (Deloitte) regarding BlockFi NB workpaper for US return of partnership income.	\$0.00	0.3	\$0.00
Wilson, Clinton	Prepare federal return workpaper for US return of partnership income and New Jersey state return of partnership income.	\$0.00	2.1	\$0.00

## Deloitte Tax LLP

### Fees Sorted by Category for the Fee Period

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees	
<b><i>Tax Compliance Services</i></b>					
05/17/2023					
	Gardyn, Jordon	Summarize financial information in workpaper for 2022 tax return to calculate the book-to-tax adjustment for fair value reporting.	\$0.00	1.1	\$0.00
	Schulhof, Ken	Review the 2022 income statement and balance sheet of BlockFi to understand what items need to change for taxable income reporting purposes as part of the mark-to-market reporting adjustment.	\$0.00	0.4	\$0.00
05/18/2023					
	Gardyn, Jordon	Discuss with M. Wojtas (Deloitte) regarding preparing the 2022 tax return workpapers for BlockFi Inc and subsidiaries.	\$0.00	0.6	\$0.00
	Gardyn, Jordon	Update the BlockFi NB LLC 2022 federal tax return workpapers with comments and sent back to C. Wilson (Deloitte) to start preparing the 2022 tax returns.	\$0.00	1.4	\$0.00
	Schulhof, Ken	Exchange messages with J. Gardyn (Deloitte) regarding the preparation of the BlockFi NB LLC 2022 federal and New Jersey tax returns.	\$0.00	0.3	\$0.00
	Wilson, Clinton	Prepare federal return for US return of partnership income (1065) for BlockFi NB federal.	\$0.00	2.3	\$0.00
	Wojtas, Mike	Discuss with J. Gardyn (Deloitte) regarding preparing the 2022 tax return workpapers for BlockFi Inc and subsidiaries.	\$0.00	0.6	\$0.00
	Wojtas, Mike	Update 2022 federal tax return workpaper for book to tax adjustments.	\$0.00	3.6	\$0.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Compliance Services</i></b>				
05/19/2023				
Forrest, Jonathan	Call with J. Gardyn, C. Gibian, R. Massey, K. Schulhof (Deloitte) discussing open questions and status of the 2022 BlockFi taxable income calculations and various tax technical considerations for BlockFi 2022 returns.	\$0.00	0.5	\$0.00
Gardyn, Jordon	Prepare template for calculating the M-1 adjustment related to mark-to-market for the 2022 tax return to share with K. Schulhof (Deloitte).	\$0.00	1.3	\$0.00
Gardyn, Jordon	Discussion with M. Wojtas (Deloitte) as part of tax return 2022 workpaper walkthrough regarding book to tax differences, open items, and approach for consolidated trial balance eliminations to financials.	\$0.00	0.5	\$0.00
Gardyn, Jordon	Call with K. Schulhof (Deloitte) discussing presentation of workbook prepared to calculate M-1 adjustment for mark-to-market and tax-basis balance sheet for year-end 2022.	\$0.00	0.4	\$0.00
Gardyn, Jordon	Call with J. Forrest, C. Gibian, R. Massey, K. Schulhof (Deloitte) discussing open questions and status of the 2022 BlockFi taxable income calculations and various tax technical considerations for BlockFi 2022 returns.	\$0.00	0.5	\$0.00
Gibian, Craig	Call with J. Forrest, J. Gardyn, R. Massey, K. Schulhof (Deloitte) discussing open questions and status of the 2022 BlockFi taxable income calculations and various tax technical considerations for BlockFi 2022 returns.	\$0.00	0.5	\$0.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Compliance Services</i></b>				
05/19/2023				
Massey, Rob	Call with J. Forrest, J. Gardyn, C. Gibian, K. Schulhof (Deloitte) discussing open questions and status of the 2022 BlockFi taxable income calculations and various tax technical considerations for BlockFi 2022 returns.	\$0.00	0.5	\$0.00
Meng, Zhaoyu	Prepare form 8858 (information return of U.S. persons with respect to foreign disregarded entities and foreign branches, filings) workpaper for disregarded foreign entities.	\$0.00	0.7	\$0.00
Meng, Zhaoyu	Reconcile profit and loss trial balance account eliminations for BlockFi 2022 tax return workpapers.	\$0.00	0.8	\$0.00
Meng, Zhaoyu	Discussion with M. Wojtas (Deloitte) of BlockFi tax return 2022 updates to consolidated eliminations.	\$0.00	0.3	\$0.00
Schulhof, Ken	Call with J. Gardyn (Deloitte) discussing presentation of workbook prepared to calculate M-1 adjustment for mark-to-market and tax-basis balance sheet for year-end 2022.	\$0.00	0.4	\$0.00
Schulhof, Ken	Call with J. Forrest, J. Gardyn, C. Gibian, R. Massey (Deloitte) discussing open questions and status of the 2022 BlockFi taxable income calculations and various tax technical considerations for BlockFi 2022 returns.	\$0.00	0.5	\$0.00
Schulhof, Ken	Review template prepared by J. Gardyn (Deloitte) to further comment on updating disclosure of amounts on the 2022 BlockFi balance sheet within the tax return workpapers.	\$0.00	0.6	\$0.00
Wilson, Clinton	Prepare federal return for US return of partnership income (1065) for BlockFi NB federal.	\$0.00	0.7	\$0.00
Wilson, Clinton	Prepare federal return for state return of partnership income (1065) for BlockFi NB New Jersey state.	\$0.00	0.4	\$0.00

## Deloitte Tax LLP

## Fees Sorted by Category for the Fee Period

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Compliance Services</i></b>				
05/19/2023				
Wojtas, Mike	Discussion with J. Gardyn (Deloitte) as part of tax return 2022 workpaper walkthrough regarding book to tax differences, open items, and approach for consolidated trial balance eliminations to financials.	\$0.00	0.5	\$0.00
Wojtas, Mike	Discussion with Z. Meng (Deloitte) of BlockFi tax return 2022 updates to consolidated eliminations.	\$0.00	0.3	\$0.00
Wojtas, Mike	Update 2022 federal tax return workpaper for book to tax adjustments provided by client.	\$0.00	3.8	\$0.00
05/22/2023				
Gardyn, Jordon	Review Bitwise K-1 received to assess tax reporting for the investment vs as presented on financial statements.	\$0.00	0.4	\$0.00
Gardyn, Jordon	Review 2021 tax return for potential further adjustments required on amended returns besides for updating fair value amounts.	\$0.00	0.7	\$0.00
Gardyn, Jordon	Adjust the BlockFi provided financial statement balance sheet liabilities for 2022 tax return purposes, provided by R. Loban (BlockFi) and includes liabilities based on values as of 11/28/2023 (Chapter 11 date).	\$0.00	1.3	\$0.00
Wilson, Clinton	Meeting with M. Wojtas (Deloitte) about issues with Line 1 of schedule K-1 of federal return of partnership income (1065).	\$0.00	0.4	\$0.00
Wilson, Clinton	Prepare federal and state return for US return of partnership income for BlockFi NB federal and New Jersey form 1065.	\$0.00	1.9	\$0.00
05/23/2023				
Forrest, Jonathan	Call with J. Gardyn, C. Gibian, K. Schulhof (Deloitte) discussing broader engagement status and expectations for timing of delivery of 2022 taxable income and tax basis balance sheet.	\$0.00	0.3	\$0.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Compliance Services</i></b>				
05/23/2023				
Gardyn, Jordon	Call with C. Gibian, MJ. Lang, M. Wojtas (Deloitte) discussing status of 2022 taxable income and tax basis balance sheet preparation and timing for delivery to BlockFi for their review.	\$0.00	0.5	\$0.00
Gardyn, Jordon	Call with J. Forrest, C. Gibian, K. Schulhof (Deloitte) discussing broader engagement status and expectations for timing of delivery of 2022 taxable income and tax basis balance sheet.	\$0.00	0.3	\$0.00
Gibian, Craig	Call with J. Forrest, J. Gardyn, K. Schulhof (Deloitte) discussing broader engagement status and expectations for timing of delivery of 2022 taxable income and tax basis balance sheet.	\$0.00	0.3	\$0.00
Gibian, Craig	Call with J. Gardyn, MJ. Lang, M. Wojtas (Deloitte) discussing status of 2022 taxable income and tax basis balance sheet preparation and timing for delivery to BlockFi for their review.	\$0.00	0.5	\$0.00
Lang, Mary Jo	Revise memorandum discussing BlockFi Inc. 2022 taxable income.	\$0.00	0.6	\$0.00
Lang, Mary Jo	Call with J. Gardyn, C. Gibian, M. Wojtas (Deloitte) discussing status of 2022 taxable income and tax basis balance sheet preparation and timing for delivery to BlockFi for their review.	\$0.00	0.5	\$0.00
Schulhof, Ken	Review book-to-tax adjustments for depreciation to reconcile cost basis increase and changes in accumulated depreciation.	\$0.00	0.6	\$0.00
Schulhof, Ken	Call with J. Forrest, J. Gardyn, C. Gibian (Deloitte) discussing broader engagement status and expectations for timing of delivery of 2022 taxable income and tax basis balance sheet.	\$0.00	0.3	\$0.00
Wilson, Clinton	Review form 1065 for federal return for US return of partnership income for BlockFi NB LLC .	\$0.00	0.8	\$0.00
Wilson, Clinton	Review forms for New Jersey state partnership return for BlockFi NB LLC	\$0.00	0.5	\$0.00

## Deloitte Tax LLP

## Fees Sorted by Category for the Fee Period

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Compliance Services</i></b>				
05/23/2023				
	Wojtas, Mike Call with J. Gardyn, C. Gibian, MJ. Lang (Deloitte) discussing status of 2022 taxable income and tax basis balance sheet preparation and timing for delivery to BlockFi for their review.	\$0.00	0.5	\$0.00
	Wojtas, Mike Update BlockFi 2022 tax return workpaper to incorporate updated adjustment information received from client.	\$0.00	2.7	\$0.00
05/24/2023				
	Gardyn, Jordon Review consolidated trial balance put together for BlockFi 2022 tax returns by M. Wojtas and Z. Meng (Deloitte).	\$0.00	0.7	\$0.00
	Lang, Mary Jo Review materials related to BlockFi Inc.'s 2022 taxable income calculation.	\$0.00	0.4	\$0.00
	Wojtas, Mike Continue to update BlockFi 2022 tax return workpaper to incorporate updated adjustment information received from client.	\$0.00	2.8	\$0.00
05/25/2023				
	Gardyn, Jordon Review questions prepared by M. Wojtas (Deloitte) on the 2022 stock options expense and BlockFi Cayman LLC trial balance to be sent to B. Matthews and S. Bailey (BlockFi).	\$0.00	0.8	\$0.00
	Lang, Mary Jo Update summary memorandum of BlockFi Inc. 2022 taxable income calculation.	\$0.00	0.7	\$0.00
	Schulhof, Ken Review the IRC Section 382 (net operating loss carryforward limitation rules) study draft deliverable prior to V. Valezco and J. Richter (Deloitte) sharing with R. Loban and S. Bailey (BlockFi).	\$0.00	0.4	\$0.00
05/30/2023				
	Gardyn, Jordon Review the consolidated trial balance, rolling up by legal entity, prepared by M. Wojtas and Z. Meng (Deloitte) based on the BlockFi separate company trial balances provided.	\$0.00	1.6	\$0.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Compliance Services</i></b>				
05/30/2023				
Gardyn, Jordon	Review the calculation of depreciation expense on the trial balance to compare the same to changes in the accumulated depreciation included as a contra-asset account.	\$0.00	0.9	\$0.00
Gardyn, Jordon	Review the book-to-tax difference associated with the gifts and donations trial balance account.	\$0.00	0.7	\$0.00
Gardyn, Jordon	Put together a list of questions based on review of the draft 2022 tax return workpapers to share with B. Mathews, R. Loban, S. Bailey, H. Powers (BlockFi) for their responses.	\$0.00	1.6	\$0.00
Gardyn, Jordon	Draft email to D. Lyness (Deloitte) regarding review of technology spending per the 2022 trial balances to assist with calculating an IRC section 174 (amortization of research and experimental expenditures) addback for taxable income purposes.	\$0.00	0.3	\$0.00
Gardyn, Jordon	Summarize the partnership investments K-1s received for 2022 while comparing the K-1 amounts to the book income reported on the BlockFi financials.	\$0.00	0.7	\$0.00
Gardyn, Jordon	Review technology spending per the 2022 trial balances.	\$0.00	1.1	\$0.00
Meng, Zhaoyu	Update tax software coding and classification of certain assets on schedule L, balance sheets per books, for the preparation of tax return workpaper.	\$0.00	3.2	\$0.00
Schulhof, Ken	Review 2022 income statement and balance sheet included in the 2022 tax return workpapers prepared by M. Wojtas and Z. Meng (Deloitte) and shared by J. Gardyn (Deloitte).	\$0.00	0.5	\$0.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Compliance Services</i></b>				
05/30/2023				
Schulhof, Ken	Review the IRC Section 382 (net operating loss carryforward rules) study deliverable to evaluate availability of the net operating loss balances for potential future taxable income liability.	\$0.00	0.6	\$0.00
Wojtas, Mike	Update BlockFi 2022 tax return workpaper for changes to mapping.	\$0.00	2.0	\$0.00
05/31/2023				
Gardyn, Jordon	Discussion with K. Schulhof (Deloitte) regarding various workstreams and any additional items required to be evaluated for tax year 2022 for BlockFi taxable income.	\$0.00	1.2	\$0.00
Gardyn, Jordon	Prepare a summary tab of the book-to-tax adjustment related to BlockFi Inc and subsidiaries for tax year 2022.	\$0.00	1.1	\$0.00
Meng, Zhaoyu	Update classifications of certain trial balance accounts for schedule L, balance sheets per books, to align with the presentation on BlockFi consolidated financial statements.	\$0.00	3.3	\$0.00
Schulhof, Ken	Discussion with J. Gardyn (Deloitte) regarding various workstreams and any additional items required to be evaluated for tax year 2022 for BlockFi taxable income.	\$0.00	1.2	\$0.00
Wilson, Clinton	Make changes to federal and New Jersey return organizers per J. Gardyn (Deloitte) comments regarding schedules K-2 and K-3 of federal US Return of Partnership Income (form 1065).	\$0.00	2.8	\$0.00
Subtotal for Tax Compliance Services:				163.8 \$154,540.00

## Deloitte Tax LLP

### Fees Sorted by Category for the Fee Period

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees	
<b><i>Tax Restructuring Services</i></b>					
05/05/2023					
	Velazco, Valerie	Review email from J. Gardyn (Deloitte) regarding files received from BlockFi to check information for the IRC section 382 (net operating loss carryforward rules) analysis which includes responses to the information request list sent by Deloitte.	\$1,020.00	0.5	\$510.00
	Velazco, Valerie	Update the IRC section 382 (net operating loss carryforward rules) information request list with BlockFi responses.	\$1,020.00	0.5	\$510.00
05/09/2023					
	Gibian, Craig	Analyze calculation of taxable income of BlockFi Inc. for 2022.	\$1,160.00	0.7	\$812.00
05/10/2023					
	Hammill, John	Analyze capitalization tables and gathering workpapers for preparation of owner shift analysis for IRC Section 382 (net operating loss carryforward rules).	\$630.00	1.1	\$693.00
05/11/2023					
	Hammill, John	Analyze client-provided capitalization tables to understand 5% shareholders for IRC Section 382 (net operating loss carryforward rules) shift analysis.	\$630.00	2.0	\$1,260.00
	Richter, Jason	Analysis of underlying information to update the IRC section 382 (net operating loss carryforward rules) analysis, issue spotting, and refresh on historic IRC section 382 (net operating loss carryforward rules) model.	\$1,160.00	1.0	\$1,160.00
	Velazco, Valerie	Receive additional IRC section 382 (net operating loss carryforward rules) information from BlockFi's team with respect to the IRC section 382 (net operating loss carryforward rules) information request list provided by Deloitte Tax.	\$1,020.00	0.3	\$306.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees	
<b><i>Tax Restructuring Services</i></b>					
05/11/2023					
	Velazco, Valerie	Update IRC section 382 (net operating loss carryforward rules) information request list.	\$1,020.00	0.3	\$306.00
	Velazco, Valerie	Email to J. Gardyn (Deloitte) with the updated IRC section 382 (net operating loss carryforward rules) information request list.	\$1,020.00	0.1	\$102.00
05/12/2023					
	Lang, Mary Jo	Review BlockFi Inc. bankruptcy filing information.	\$1,020.00	0.4	\$408.00
	Lang, Mary Jo	Review FTX Trading Ltd. agreements to prepare summary of tax considerations.	\$1,020.00	2.0	\$2,040.00
	Velazco, Valerie	Email communication with J. Gardyn (Deloitte), C. Gibian, M.J. Lang (Deloitte's Washington National Tax) regarding BlockFi's debt agreement regarding need to evaluate agreement for IRC section 382 (net operating loss carryforward rules) purposes.	\$1,020.00	0.5	\$510.00
05/15/2023					
	Hammill, John	Analyze BlockFi Inc.-provided capitalization tables to understand 5% shareholders for IRC Section 382 (net operating loss carryforward rules) shift analysis.	\$630.00	2.7	\$1,701.00
	Hammill, John	Calculate fair market value per share of each tranche of stock for each test date based on client-provided 409A valuations.	\$630.00	2.1	\$1,323.00
	Hammill, John	Update documentation on shift analysis workpapers to properly record fair market values for each tranche of stock.	\$630.00	1.8	\$1,134.00
	Hammill, John	Input fair market values for each transaction into proprietary IRC Section 382 (net operating loss carryforward rules) software to reflect 5% shareholders change in cumulative shift.	\$630.00	1.4	\$882.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees	
<b><i>Tax Restructuring Services</i></b>					
05/15/2023					
	Hammill, John	Compile transaction log to summarize equity events on each testing date to understand 5% shareholders for IRC Section 382 (net operating loss carryforward rules) shift analysis.	\$630.00	0.6	\$378.00
	Velazco, Valerie	Review various e-mail correspondence between BlockFi and J. Gardyn (Deloitte) which included attachments, to check files provided are not for IRC section 382 (net operating loss carryforward rules) purposes.	\$1,020.00	0.5	\$510.00
05/16/2023					
	Gibian, Craig	Analyze calculation of 2022 taxable income for BlockFi Inc.	\$1,160.00	1.0	\$1,160.00
	Hammill, John	Compile transaction log to summarize equity events on each testing date to understand 5% shareholders for IRC Section 382 (net operating loss carryforward rules) shift analysis.	\$630.00	2.0	\$1,260.00
	Richter, Jason	Analysis on structure from proposed bankruptcy plan regarding relative to impact of IRC section 382 (net operating loss carryforward rules).	\$1,160.00	1.0	\$1,160.00
	Velazco, Valerie	Review IRC section 382 (net operating loss carryforward rules) analysis which summarizes equity activity based on financial statements, capitalization tables, values of each class of stock from 409A valuation reports.	\$1,020.00	4.0	\$4,080.00
05/17/2023					
	Hammill, John	Review comments from V. Velazco (Deloitte) to update documentation on capitalization tables.	\$630.00	0.9	\$567.00
	Hammill, John	Input transaction log into IRC Section 382 (net operating loss carryforward rules) software to summarize IRC Section 382 (net operating loss carryforward rules) shift analysis.	\$630.00	3.7	\$2,331.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees	
<b><i>Tax Restructuring Services</i></b>					
05/17/2023					
	Lang, Mary Jo	Review disclosure statement for planning to update BlockFi Inc. 2022 taxable income summary.	\$1,020.00	0.5	\$510.00
	Richter, Jason	Review of IRC section 382 (net operating loss carryforward rules) model, underlying source information, inputs, and application of technical rules for IRC section 382 (net operating loss carryforward rules).	\$1,160.00	3.6	\$4,176.00
05/18/2023					
	Hammill, John	Review comments from V. Velazco (Deloitte) to update transaction log and input transaction log into 382 software to summarize IRC Section 382 (net operating loss carryforward rules) shift analysis.	\$630.00	2.0	\$1,260.00
	Lang, Mary Jo	Review disclosure statement for planning to update BlockFi Inc. 2022 taxable income summary.	\$1,020.00	1.3	\$1,326.00
	Velazco, Valerie	Review updates to workpapers related to analysis of valuation reports, capitalization tables, and financial statements made by J. Hammill (Deloitte) following review comments from the initial review.	\$1,020.00	3.0	\$3,060.00
05/19/2023					
	Hammill, John	Prepare section 382 analysis for delivery.	\$630.00	2.4	\$1,512.00
	Hammill, John	Call with V. Velazco, J. Richter (Deloitte) to review the IRC section 382 (net operating loss carryforward rules) analysis.	\$630.00	0.7	\$441.00
	Lang, Mary Jo	Prepare summary regarding treatment of FTX Trading Ltd loan.	\$1,020.00	0.3	\$306.00
	Richter, Jason	Review of IRC section 382 (net operating loss carryforward rules) model, underlying source information, inputs, and application of technical rules for IRC section 382 (net operating loss carryforward rules).	\$1,160.00	1.0	\$1,160.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Restructuring Services</i></b>				
05/19/2023				
Velazco, Valerie	Review additional updates to the presentation of equity activity from financial statement and capitalization table made by J. Hammill (Deloitte) to the IRC section 382 (net operating loss carryforward rules) model.	\$1,020.00	1.0	\$1,020.00
Velazco, Valerie	Review additional updates to the presentation of equity activity from financial statement and capitalization table made by J. Hammill (Deloitte) to the IRC section 382 (net operating loss carryforward rules) workpapers.	\$1,020.00	1.0	\$1,020.00
Velazco, Valerie	Call with J. Hammill, J. Richter (Deloitte) to review the IRC section 382 (net operating loss carryforward rules) analysis.	\$1,020.00	0.7	\$714.00
05/22/2023				
Gardyn, Jordon	Review the draft IRC section 382 (net operating loss carryforward limitation rules) study shared by V. Valezco (Deloitte) and respond to V. Valezco (Deloitte) comments/questions from the email sharing the draft calculation.	\$1,020.00	0.4	\$408.00
Richter, Jason	Research the application of IRC section 382(l)(5) and 382(l)(6) (both sections mean net operating loss carryforward rules) for further analysis depending upon BlockFi plan.	\$1,160.00	2.0	\$2,320.00
05/23/2023				
Gardyn, Jordon	Review email from V. Velazco (Deloitte) discussing code sections under IRC Section 382 (net operating loss carryforward rules) and comments on the various code sections.	\$1,020.00	0.3	\$306.00
Richter, Jason	Final review of IRC section 382 (net operating loss carryforward rules) model, underlying source information and changes based upon review notes.	\$1,160.00	2.0	\$2,320.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Restructuring Services</i></b>				
05/23/2023				
	Velazco, Valerie Email J. Hammill, J. Richter (Deloitte) regarding the application of the hold constant principle to the IRC section 382 (net operating loss carryforward rules) ownership shift analysis.	\$1,020.00	0.3	\$306.00
05/24/2023				
	Gardyn, Jordon Call with J. Hammill, V. Velazco, J. Richter (Deloitte) discussing the results and timing for delivery of the IRC Section 382 (net operating loss carryforward rules) study performed for BlockFi.	\$1,020.00	0.4	\$408.00
	Hammill, John Call with J. Gardyn, V. Velazco, J. Richter (Deloitte) discussing the results and timing for delivery of the IRC Section 382 (net operating loss carryforward rules) study performed for BlockFi.	\$630.00	0.4	\$252.00
	Richter, Jason Call with J. Gardyn, J. Hammill, V. Velazco (Deloitte) discussing the results and timing for delivery of the IRC Section 382 (net operating loss carryforward rules) study performed for BlockFi.	\$1,160.00	0.4	\$464.00
	Velazco, Valerie Call with J. Gardyn, J. Hammill, J. Richter (Deloitte) discussing the results and timing for delivery of the IRC Section 382 (net operating loss carryforward rules) study performed for BlockFi.	\$1,020.00	0.4	\$408.00
05/25/2023				
	Lang, Mary Jo Review BlockFi Inc. disclosure statement.	\$1,020.00	0.6	\$612.00
05/31/2023				
	Gardyn, Jordon Call with J. Hammill, J. Richter, V. Velazco (Deloitte), R. Loban, S. Bailey, H. Powers (BlockFi) discussing the delivered IRC Section 382 (net operating loss carryforward rules) study and the implications of the results.	\$1,020.00	0.5	\$510.00

**Deloitte Tax LLP**

**Fees Sorted by Category for the Fee Period**

May 01, 2023 - May 31, 2023

Date	Description	Rate	Hours	Fees
<b><i>Tax Restructuring Services</i></b>				
05/31/2023				
Hammill, John	Call with J. Gardyn, J. Richter, V. Velazco (Deloitte), R. Loban, S. Bailey, H. Powers (BlockFi) discussing the delivered IRC Section 382 (net operating loss carryforward rules) study and the implications of the results.	\$630.00	0.5	\$315.00
Richter, Jason	Call with J. Gardyn, J. Hammill, V. Velazco (Deloitte), R. Loban, S. Bailey, H. Powers (BlockFi) discussing the delivered IRC Section 382 (net operating loss carryforward rules) study and the implications of the results.	\$1,160.00	0.5	\$580.00
Richter, Jason	Prepare for discussion with R. Loban (BlockFi) by reviewing drivers of IRC Section 382 (net operating loss carryforward rules) model around value, equity exchanges, and technical rules/tax law to identify conclusions for IRC Section 382 purposes.	\$1,160.00	0.7	\$812.00
Velazco, Valerie	Call with J. Gardyn, J. Hammill, J. Richter (Deloitte), R. Loban, S. Bailey, H. Powers (BlockFi) discussing the delivered IRC Section 382 (net operating loss carryforward rules) study and the implications of the results.	\$1,020.00	0.5	\$510.00
Subtotal for Tax Restructuring Services:				58.5 \$52,139.00
<b>Total</b>				<b>222.5 \$52,343.00</b>

**Adjustment**

Fixed Fee: May 2023: Tax Compliance Services	\$154,540.00
<b>Adjustment Subtotal :</b>	<b>\$154,540.00</b>
<b>Total</b>	<b>222.5 \$206,883.00</b>

## Deloitte Tax LLP

### Fees Sorted by Category for the Fee Period

May 01, 2023 - May 31, 2023

#### Recapitulation

Name	Rate	Hours	Fees
Gibian, Craig	\$1,160.00	1.7	\$1,972.00
Richter, Jason	\$1,160.00	12.2	\$14,152.00
Gardyn, Jordon	\$1,020.00	1.6	\$1,632.00
Lang, Mary Jo	\$1,020.00	5.1	\$5,202.00
Velazco, Valerie	\$1,020.00	13.8	\$14,076.00
Hammill, John	\$630.00	24.3	\$15,309.00
DiPaolo, Michele	\$0.00	0.5	\$0.00
Forrest, Jonathan	\$0.00	1.3	\$0.00
Gardyn, Jordon	\$0.00	43.7	\$0.00
Gibian, Craig	\$0.00	4.6	\$0.00
Kothari, Mahek	\$0.00	0.1	\$0.00
Krozek, Derek	\$0.00	0.3	\$0.00
Lang, Mary Jo	\$0.00	11.1	\$0.00
Lee, Sarah	\$0.00	8.8	\$0.00
Massey, Rob	\$0.00	1.5	\$0.00
Meng, Zhaoyu	\$0.00	31.0	\$0.00
Schulhof, Ken	\$0.00	18.8	\$0.00
Wilson, Clinton	\$0.00	12.8	\$0.00
Wojtas, Mike	\$0.00	29.3	\$0.00
Fixed Fee: May 2023: Tax Compliance Services			\$154,540.00
<b>Total</b>		<b>222.5</b>	<b>\$206,883.00</b>

**EXHIBIT B**

Professional Expenses for the Period from  
May 1, 2023 through May 31, 2023

BlockFi, Inc

Deloitte Tax LLP

## Expenses Sorted by Category for the Fee Period

May 01, 2023 - May 31, 2023

Category	Date	Description	Amount
<b><i>Airfare</i></b>			
Gardyn, Jordon	05/09/2023	Roundtrip coach airfare from Ft. Lauderdale, FL to New York City, NY.	\$344.53
Subtotal for Airfare:			<hr/> \$344.53
<b><i>Hotel</i></b>			
Gardyn, Jordon	05/30/2023	1 night hotel accommodation at Sheraton in New York, NY.	\$294.97
Subtotal for Hotel:			<hr/> \$294.97
<b><i>Internet Access While Traveling</i></b>			
Gardyn, Jordon	05/12/2023	Airline internet access while traveling.	\$19.00
Subtotal for Internet Access While Traveling:			<hr/> \$19.00
<b><i>Meals</i></b>			
Hammill, John	05/16/2023	Dinner in San Francisco, CA.	\$10.89
Gardyn, Jordon	05/31/2023	Dinner in New York, NY.	\$22.03
Subtotal for Meals:			<hr/> \$32.92
Total			<hr/> \$691.42

BlockFi, Inc

Deloitte Tax LLP

## Expenses Sorted by Category for the Fee Period

May 01, 2023 - May 31, 2023

### Recapitulation

Category	Amount
Airfare	\$344.53
Hotel	\$294.97
Meals	\$32.92
Internet Access While Traveling	\$19.00